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18 **UNITED STATES DISTRICT COURT**
19 **FOR THE DISTRICT OF NEVADA**

20 UNITED STATES OF AMERICA,
21 Plaintiff,
22 vs.
23 JACQUES LANIER,
24 Defendant.

25 CASE NO.: 2:19-CR-327-GMN-VCF

26 **STIPULATION TO EXTEND DEADLINE**
27 **FOR REPLY TO GOVERNMENT'S**
28 **RESPONSE TO DEFENDANT'S (Second)**
29 **MOTION TO MODIFY ORDER**
30 **RESTRICTING DEFENDANT'S**
31 **TELEPHONE AND MAILING**
32 **PRIVILEGES [ECF NO. 240]**

33 IT IS HEREBY STIPULATED AND AGREED by JACQUES LANIER, by and through
34 his attorneys, ANTHONY P. SGRO, ESQ., ALANNA C. BONDY, ESQ., CHRISTOPHER R.
35 ORAM, ESQ., and the United States of America, by and through BIANCA R. PUCCI, ESQ.,
36 Assistant United States Attorney, that the deadline to file Defendant's Reply to the Government's
37 Response to Defendant's (Second) Motion to Modify Order Restricting Defendant's Telephone
38 and Mailing Privileges [ECF No. 240], which is currently due on April 28, 2023, be extended to
39 May 2, 2023.

1 The stipulation is entered for the following reasons:

2 1. Defense Counsel needs to consult with Mr. Lanier in order to adequately respond
3 to the allegations contained in the Government's Response to Defendant's (Second) Motion to
4 Modify Order Restricting Defendant's Telephone and Mailing Privileges.

5 2. To date, Defense counsel has been unable to communicate with Mr. Lanier
6 regarding the allegations contained in the Government's Response to Defendant's (Second)
7 Motion to Modify Order Restricting Defendant's Telephone and Mailing Privileges.

8 3. The parties agree to extension.

9 4. The additional time requested herein is sought in good faith and not sought for
10 purposes of delay.

11 5. Additionally, denial of this request for continuance could result in a miscarriage
12 of justice.

13 DATED this 28th day of April 2023.

14 *Respectfully submitted:*

15 **SGRO & ROGER**

16 /s/ *Alanna C. Bondy, Esq.*

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/s/ *Christopher Oram, Esq.*

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23 **UNITED STATES DISTRICT
24 ATTORNEY'S OFFICE**

/s/ *Bianca Pucci, Esq.*

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Attorney for the United States of America

ORDER

Pursuant to the foregoing stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED that the Defendant's Reply to the Government's Response to Defendant's (Second) Motion to Modify Order Restricting Defendant's Telephone and Mailing Privileges [ECF No. 240] must be filed on or before May 2, 2023.

IT IS SO ORDERED.

IT IS SO ORDERED.

Respectfully submitted by:

SGRO & ROGER

Cam Ferenbach
United States Magistrate Judge

/s/Alanna C. Bondy.
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DATED 4-28-2023